

Exhibit C



Maia Walker <maia.walker@thefire.org>

Fwd: Follow up from Call from Wednesday

Daniel Ortner <daniel.ortner@thefire.org>
To: Maia Walker <maia.walker@thefire.org>

From: **Daniel Ortner** <daniel.ortner@thefire.org>
Date: Tue, Apr 23, 2024 at 11:02AM
Subject: Re: Follow up from Call from Wednesday
To: Holland, Andrew S. <Andrew.Holland@wilsonelser.com>
Cc: Jay Diaz <jay.diaz@thefire.org>, Gabe Walters <gabe.walters@thefire.org>, JT Morris <JT.Morris@thefire.org>, Greil, John <john.greil@law.utexas.edu>

Andy,

With regard to the Court's stay order, I did have an additional request/question.

Would the City be willing to not oppose a motion for clarification that proceeded along the lines of the stipulation that I proposed a few weeks ago? Specifically, we would be asking the court to clarify 1) the scope of the term "related to;" 2) that the stay only applies to *Monell* discovery related to the claims against the officers; and 3) that the stay only applies to "training and supervision documentation" related to the officers.

Here are the specific changes we would be asking for to that effect:

- 1) In Paragraph 2, change "related to any Monell claims" to "any Monell claims related to the claims against or defenses of the Officers"
- 2) In Paragraph 3, change "training and supervision documentation, the contents of either . . ." to "and training and supervision documentation related to the Officers, as well as the contents of either . . ."
- 3) Add the following sentence to the order: "For purposes of this order, the phrase 'related to the Officers' or 'related to the claims against the Officers' refers to discovery that is specifically connected to the Defendant Officers as individuals or would directly implicate the claims against them."

If the City is willing to not oppose our motion, then we will keep our motion narrowly focused on seeking clarification on these points where we are in agreement or pretty close to agreement.

Please let us know your position as soon as you can.

Best,

[Quoted text hidden]